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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

3:16-CV-01057-MA

Plaintiff,

v.

**COMPLAINT *IN REM* FOR
FORFEITURE**

**50 FIREARMS AND ASSORTED
AMMUNITION, *in rem*,**

Defendants.

Plaintiff, United States of America, by Billy J. Williams, United States Attorney for the District of Oregon, and Katherine C. Lorenz, Assistant United States Attorney, for its complaint *in rem* for forfeiture, alleges:

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 18 U.S.C. § 924; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendants, *in rem*, 50 Firearms and Assorted Ammunition, further described in the attached Exhibit A (the Declaration of Katherine D. Armstrong, Special Agent at the Federal Bureau of Investigation), are now and during the pendency of this action will be within the jurisdiction of this Court.

III.

Defendants, *in rem*, 50 Firearms and Assorted Ammunition, were involved in or used in a conspiracy to impede officers of the United States, in knowing and willful violation of 18 U.S.C. § 372, and are therefore forfeitable to the United States pursuant to 18 U.S.C. § 924(d), as more particularly set forth in the attached declaration of Special Agent Katherine D. Armstrong, marked as Exhibit A, which is attached and incorporated herein by this reference.

WHEREFORE, plaintiff, United States of America, prays that due process issue to enforce the forfeiture of defendants, *in rem*, 50 Firearms and Assorted Ammunition; that due notice be given to all interested persons to appear and show cause why forfeiture of these defendants, *in rem*, should not be decreed; that due proceedings be had thereon; that these defendants be forfeited to the United States; that the plaintiff United States of America be awarded its costs and disbursements

incurred in this action, and that plaintiff have such other and further relief as is just and equitable.

Respectfully submitted this 10th day of June 2016.

BILLY J. WILLIAMS
United States Attorney

s/ Katie Lorenz
KATHERINE C. LORENZ
Assistant United States Attorney

VERIFICATION

I, Katherine D. Armstrong, declare, under penalty of perjury, pursuant to the provisions of 28 U.S.C. § 1746, that I am a Special Agent with the Federal Bureau of Investigation (FBI), and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished, and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

s/ Katherine D. Armstrong

KATHERINE D. ARMSTRONG

Special Agent

Federal Bureau of Investigation